

1 ROBERT S. BREWER, JR. (SBN 64294)
2 JAMES S. MCNEILL (SBN 201663)
3 MCKENNA LONG & ALDRIDGE LLP
4 Suite 3300, Symphony Towers
5 750 B Street
6 San Diego, CA 92101
7 Telephone: (619) 595-5400
8 Facsimile: (619) 595-5450

9 Attorneys for Defendant
10 GLOBAL CHECK SERVICES

11 **UNITED STATES DISTRICT COURT**
12 **SOUTHERN DISTRICT OF CALIFORNIA**

13 JPA FURNITURE INC., ON BEHALF OF
14 ITSELF AND ALL OTHERS
15 SIMILARLY SITUATED,

16 Plaintiff,

17 v.

18 GLOBAL CHECK SVC.,

19 Defendant.

CASE NO. 08 CV 0978 BEN (BLM)

**JOINT MOTION BY DEFENDANT
GLOBAL CHECK SERVICES AND
PLAINTIFF JPA FURNITURE INC. FOR
EXTENSION OF TIME TO RESPOND TO
COMPLAINT**

Complaint filed: June 2, 2008
Trial Date: None Set

20 Plaintiff JPA FURNITURE, INC. ("Plaintiff") and Defendant GLOBAL CHECK
21 SERVICES ("Defendant"), by and through their counsel, agree and stipulate as follows:

22 1. On or about June 3, 2008, Plaintiff filed its complaint in the United States District
23 Court for the Southern District of California;

24 2. Defendant was served on June 3, 2008;

25 3. Defendant's responsive pleading is presently due on June 23, 2008;

26 4. Defendant has been diligently searching for suitable counsel in the Southern
27 District of California;

28 5. On or about June 19, 2008, Defendant retained the law firm of McKenna Long &
Aldridge LLP to serve as Defendant's counsel;

1 6. Given the pendency of the current response date and that McKenna Long &
2 Aldridge LLP was only recently engaged as counsel, Defendant's counsel requires additional time
3 to properly review Plaintiff's complaint and prepare the appropriate response thereto;

4 7. Defendant's counsel conferred with counsel for Plaintiff on June 20, 2008, and the
5 parties have agreed to extend the date of Defendant's response to July 14, 2008; and

6 8. There have been no prior extensions to file a responsive pleading to the Complaint.

7
8 THEREFORE, the parties agree, stipulate and jointly move to continue the due date for
9 Defendant's responsive pleading to **July 14, 2008**.

10 Dated: June 20, 2008

Braun Law Group, P.C.

The Katriel Law Firm, PLLC

11
12
13 By: s/Michael D. Braun

14 Michael D. Braun

15 Attorneys for Plaintiff

16 JPA FURNITURE INC.

17 E-mail: service@braunlawgroup.com

18 Dated: June 20, 2008

McKenna Long & Aldridge LLP

19 By: s/ James S. McNeill

20 James S. McNeill

21 Attorneys for Defendant

22 GLOBAL CHECK SERVICES

23 E-mail: jmcneill@mckennalong.com
24
25
26
27
28

1 I, James S. McNeill, hereby certify that the content of this joint motion is acceptable to all
2 parties who are required to sign this joint motion. Plaintiff's counsel authorizes Defendant Global
3 Check Services to affix his CM/ECF electronic signature to this joint motion.

4 Dated: June 20, 2008

McKenna Long & Aldridge LLP

6 By: s/ James S. McNeill

James S. McNeill
Attorneys for Defendant
GLOBAL CHECK SERVICES
E-mail: jmcneill@mckennalong.com

10 SD:22166180.1

JPA FURNITURE INC. v. GLOBAL CHECK SVC.
United States District Court Case No. 08-CV-0978 BEN (BLM)

CERTIFICATE OF SERVICE

I, James S. McNeill, certify that I caused to be served upon the following counsel and parties of record a copy of the following document(s):

- **JOINT MOTION BY DEFENDANT GLOBAL CHECK SERVICES AND PLAINTIFF JPA FURNITURE INC. FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT**
- **ORDER GRANTING JOINT MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT**

as indicated/listed on the United States District Court, Southern District of California's CM/ECF registered email list in the above-referenced matter.

Michael D. Braun, Esq.
BRAUN LAW GROUP, P.C.
12400 Wilshire Blvd., Suite 920
Los Angeles, CA 90025
Tel.: (310) 442-7755/Fax: **(310) 442-7756**
E-mail: service@braunlawgroup.com

Attorneys for Plaintiff

via personal service, overnight mail (VIA UPS Overnight), facsimile, first class mail or e-mail, as indicated below:

Roy A. Katriel, Esq.
THE KATRIEL LAW FIRM, PLLC
1101 30TH Street, NW, Suite 500
Washington, DC 20007
Tel.: (202) 625-4342/Fax: **(202) 330-5593**
E-mail: rak@katriellaw.com

Attorneys for Plaintiff

Via U.S. Mail

Executed on **June 20, 2008**, in San Diego, California.

s/James S. McNeill

James S. McNeill